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Inspector Paul Clark BA MA MRTPI
c/o Louise St John Howe
Programme Officer
PO Services
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Dear Mr Clark,

Aylesbury Vale District Council Examination in Public into new Local Plan

I write on behalf of Vanderbilt Strategic as a follow-up to Session 11 of the Vale of Aylesbury Local Plan 2013-2033 Examination held on the afternoon of Wednesday 11th July 2018. I was present and participated in the Session, on behalf of Vanderbilt Homes.

I am of the opinion that the session was rushed and felt compressed, and that not enough time was given to debate the key issues. This was made especially acute given the number of participants in the Session. Indeed, originally only 1½ hours was allocated to the session so at the outset it was essential to revise the agenda and order of the session.

Despite this change to the running order, the session was rushed and the issues were not, in my view, given a thorough examination, even though the session ran on until close to 7pm. The Spatial Distribution matters and questions cut to the very heart of the Plan; it is a fundamental issue central to the Plan and the test of 'soundness'. A single session with 45+ participants is insufficient time to tackle this, given the deficiencies in the Plan.

In this regard, I hope that the Inspector doesn't object to me briefly summarising the key points of concern of Vanderbilt and to expand on the comments I made at the Examination:

- Firstly, the draft AVDC Plan is clearly influenced by the draft Aston Clinton Neighbourhood plan. The VALP draws from (amongst other things) the Sustainability Appraisal, which on p.41 quotes the Neighbourhood Plan and "*the view of many...*". The direct influence of the draft Neighbourhood Plan flowing through the evidence base and into the draft VALP is clear.
- This stance is contrary to the studies and assessment in the evidence base which show that Aston Clinton is "*best placed to accommodate future development*" (Settlement Hierarchy Assessment 6.1), and how Aston Clinton meets 10 of the 11 key criteria listed in this document.
- Larger Villages provide a sustainable solution to delivering small to medium housing sites now. These are sites that do not require major infrastructure to be in place first. Such an approach will accord with NPPF principles of delivering housing quickly.



- Indeed, the Technical Appendix of the Sustainability Appraisal states that “*higher growth at Aston Clinton is supported, as the village is located at the District’s southern extent, which is the direction from which unmet needs arise*”.
- In their response to the Inspector’s question 1 (inquiry ref. ED22A) AVDC have suggested (in the table) that there are no allocations in Aston Clinton because of the high number of commitments. However, the same could be said of Aylesbury or Buckingham which are getting additional housing allocations. A high level of commitments is not a reason to adopt a policy of no allocations.
- The high number of commitments is precisely because Aston Clinton is a sustainable settlement that can accommodate growth, which is supported by the assessment in the Sustainability Appraisal and the Settlement Hierarchy Assessment. There is no suggestion that there are no more sites possible or that more housing in Aston Clinton would result in harm.

In summary on this point, the situation is one where ‘the tail is wagging the dog’. The draft Aston Clinton Neighbourhood Plan is clearly influencing the content of the submission VALP, which runs contrary to the Council’s own evidence base and assessments.

I also raised the point on education provision at Aston Clinton, as this flawed assessment the Council have made is the basis for the spatial strategy that is proposed:

- Fundamental to the assessment of Aston Clinton’s suitability to accommodate more growth is the ‘opportunities and constraints’ section of the Sustainability Appraisal Technical Appendix on p.65. It highlights school capacity, and suggests there are only two options: do nothing, or 700-800 homes in order to fund a new school.
- This false dichotomy disregards a third way (or indeed a multitude of other ways in between): smaller developments whose impact can be successfully mitigated. In the representations on behalf of Vanderbilt previously submitted to the Inspector it was highlighted how in October 2017 Buckinghamshire County Council stated how the impact of an 89 dwelling scheme in Aston Clinton could be mitigated via a financial sum to upgrade existing facilities.
- This is contrary to what is implied at 6.5.50 of the Sustainability Appraisal which states that officers at Buckinghamshire County Council have concerns. There may be *concerns*, this is true of any application, but these concerns can be easily mitigated through a variety of means depending on the scale of development.
- Furthermore, the Sustainability Appraisal acknowledges that the potential for the new schools planned to the east and south east of Aylesbury to accommodate children from Aston Clinton has not been established. This is a significant ‘gap’ in the assessment, the implications have not been properly assessed, understood, or taken into account. The assessment is flawed, and unsound.
- The Council have come up with two extreme options – do nothing, or 800 homes in a single large development – and this forms the basis of assessing all other factors such as suitability for housing, heritage impact, landscape impact etc. We accept that ‘do nothing’ might be preferable to 800 homes in one single large development, but this is not a reasonable, fair, or sound comparison. The Sustainability Appraisal does not assess any more realistic ‘middle ground’ scenarios, which if it did, would lead to a quite different conclusion on the ability for Aston Clinton to sustainably handle additional housing allocation(s).



Flowing from this, and turning back to a District-wide point, the individual allocations proposed across the District are for the most part large or medium in size. There is very little in the way of allocations which are suitable for small and medium-sized housebuilders, instead there is an over-reliance on large housebuilders to bring forward housing in the District and meeting neighbouring Authorities' unmet need.

Aston Clinton is ideally suited to smaller sites capable of being brought forward by smaller housebuilders, due in part to the factors outlined above. The impact of smaller sites can be mitigated (as demonstrated by the County Council's comments on an 89 unit scheme from October 2017, outlined above) and such sites would avoid a dependency or reliance on larger housebuilders in order to meet housing need.

In this regard, we note how paragraph 68 of the new NPPF states that "*small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly*", going on to provide guidance on how local planning authorities should promote the development of a good mix of sites. The ambition is clear.

Summary

The assessment which informs the draft VALP is fundamentally flawed, it is unsound. The starting point of concluding 'do nothing' as a preference informs the spatial distribution strategy of the VALP, which cuts to the very heart of the Plan.

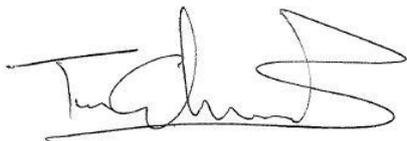
The garden village ambition represents a putting all the eggs in one basket strategy which will be delivered further down the line, however this strategy should not overlook more readily available, sustainable, and suitable locations. This includes unconstrained fringes to the north of Aston Clinton.

The draft VALP does not allocate housing in Aston Clinton because there are existing commitments. In addition to the unsound way in which 'do nothing' has been reached, this strategy completely neglects the future. These commitments will all be built out in the first part of the Plan period, leaving no capacity for the later years.

Aston Clinton (and other larger villages) is a sustainable settlement ideally suited to accommodate growth, and the Plan is unsound in not allowing more housing there. 10 of 11 key sustainability criteria are met, and it is identified as a good location for future unmet need. This is not our view, this is set out in the Council's own evidence base documents. The existing commitments are precisely because it is suitable and capable of accommodating growth.

However, the tail has been wagging the dog and the influence of the draft Aston Clinton Neighbourhood Plan has resulted in a 'do nothing' option being reached. This is unsound. Overall, turning back to the Examination and Session 11 specifically, I feel the spatial distribution has not been properly examined given these fundamental flaws in the strategy, and there needs to be more time allocated for a detailed discussion on these issues.

Yours sincerely,



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